Q. DO YOU HAVE ANY EVIDENCE THAT, DESPITE MR. GANSERT'S CLAIMS, VERIZON BELIEVES BIGGER SAI'S ARE BETTER THAN SMALLER SAI'S?

A. Yes. Despite Mr. Gansert's claim to the contrary, Verizon actually believes that bigger SAIs are more efficient than smaller SAIs – which makes logical sense. I have included a magazine article as Exhibit JCD-6 that quotes New England Telephone (at Page 14) as stating that they are very excited about using a new extra-large 8100-line SAI.

> "Doing it this way eliminates the guesswork in service provisioning," says Johnson. He sees the 8100-pair SAI as "a major labor-savor for us."

This is a quote from a Verizon "engineering specialist" who was project manager for an actual outside plant engineering job described in this article in the trade journal *Cable Foreman*.

Q. WHAT CONCLUSIONS DO YOU MAKE ABOUT MR. GANSERT'S CLAIM THAT SMALLER DISTRIBUTION AREAS ARE BETTER THAN LARGER ONES?

A. Mr. Gansert's position that the objective is to achieve the minimum size distribution area is ludicrous, cannot be supported by industry opinion, and is not even believed by practicing engineers at Verizon. His testimony is both factually and logically unsound.

Q. DR. TARDIFF AND MR. GANSERT CLAIM THAT THE HAI MODEL UNDERESTIMATES SAI INVESTMENT. DO YOU AGREE?

A. No. Dr. Tardiff's testimony claims that the HAI Model improperly sizes SAIs. He is wrong on two grounds: (1) he makes errors in simple arithmetic, and (2) he leaps to incorrect conclusions regarding the way a good outside plant engineer would size an SAI. Dr. Tardiff correctly states that SAI sizes are based on 3.5 times the number of households, plus 2 times the number of miscellaneous lines.